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U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

IN THE UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION

RUSSELL G. GREER,

Plaintiff

v.

TAYLOR A. SWIFT,

Defendant

**PLAINTIFF'S EMERGENCY MOTION
FOR ISSUANCE OF A SUBPOENA TO
PRODUCE DOCUMENTS**

Case No.: 3:18-cv-00394

Presiding Judge: Aleta A. Trauger

Magistrate Judge: Alistair Newbern

Pursuant to *LR45.01* of the Middle District Court of Tennessee's Local Rules, Plaintiff files this EMERGENCY MOTION for ISSUANCE of a SUBPOENA TO PRODUCE DOCUMENTS. Plaintiff's respectful request reads as follows.

INTRODUCTION

On November 16th, 2018, the Court allowed for the summons to be reissued. Due to miscommunication with the Court Clerk, Plaintiff didn't receive the reissued summons until sometime after 11/26/18. Having exhausted all leads on serving Defendant, Greer decided to try serving Defendant's management company, though, he had been unsuccessful before with trying to find a physical, reliable address to serve her management, *13 Management* and *Taylor Nation*. Greer went onto the Tennessee Business Search website and pulled up her management's mailing address: "718 THOMPSON LN STE 108256, NASHVILLE, TN 37204-3600 USA". Upon further inspection on Google Maps, the address appeared to be linked to the UPS Store at 718 Thompson Lane, STE 108. It was then inferred that the "256" in "108256" was the mailbox belonging to 13 Management.

Plaintiff reached out to the UPS Store to provide the physical address attached to 13 Management's mailbox. On 11/25/2018, Douglas Sipes, owner of UPS Store 4687, emailed Plaintiff and refused the request. In his response, Mr. Sipes stated, "Normally, I only issue information when I am **subpoenaed** by a court to do so." **EXHIBIT B**. Based on that, Plaintiff submits this EMERGENCY MOTION asking for a subpoena to obtain the address for service, which Plaintiff has attached. **EXHIBIT A**.

SUBPOENA SHOULD BE ISSUED

This Court should issue the attached subpoena because obtaining Defendant's management's address will be the only way that this case can move forward, as serving her management will satisfy the rules of proper service. As explained and shown before, personally serving her will be next to impossible. As also previously shown, Plaintiff has attempted service upon other representatives of Defendant Swift, to which he had no success. Further, the subject

of the subpoena, Douglas Sipes, has stated that he will only release the address information if he is given a subpoena by a court ordering him to release such information. Therefore, Plaintiff respectfully motions this Court to issue the attached subpoena so that the address can be given to Plaintiff and that service can be had upon Defendant's management for Defendant. Given the urgency of meeting deadlines, Plaintiff files this motion as an EMERGENCY MOTION.

CONCLUSION

Based upon the above, Plaintiff asks that the Motion be granted and that the attached subpoena be issued to Douglas Sipes.

Respectfully submitted,

DATED: December 23rd, 2018

Respectfully submitted,

By:

Russell Greer
Pro Se Litigant
/rgreer/

A handwritten signature in black ink, appearing to be 'R Greer', with a stylized flourish at the end.